



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 23, 2014

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
United States District Court for the  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re:    United States of America v. Atto Dangoutoule  
13 Cr. 232 (RA)**

Dear Judge Abrams:

The Government writes in advance of the sentencing of Atto Dangoutoule, the defendant, which is currently scheduled for February 24, 2014, and in response to the defendant's sentencing submission of February 11, 2014. The Government respectfully submits that a sentence within the advisory Guidelines range would be sufficient, but not greater than necessary, to comply with the purposes of sentencing.

The defendant has pled guilty to a one-count indictment for being a felon in possession of a fire arm, in violation of Title 18, United States Code, Section 922(g). The defendant has a stipulated United States Sentencing Guidelines ("Guidelines") range of 10 to 16 months' imprisonment.

A sentence falling within the advisory Guidelines range is appropriate given the defendant's conduct. The defendant carried a gun with him while in the vicinity of other people on multiple occasions. First, he brought a gun with him to a cab,<sup>1</sup> and second, he brought a gun with him to a night lounge. His conduct was unquestionably dangerous and could have resulted in harm to others. To the extent that defense counsel concedes that the defendant's conduct was the result of "faulty judgment," the Government agrees. Accordingly, the Government

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<sup>1</sup> Although the defendant states no objections to the Pre-Sentence Report, aside from the fact that it says he was born in Bamboo, Mali, he does seem to dispute whether the defendant ever took cab to the lounge where he was arrested. (Def. Brief 6).

respectfully submits that a Guidelines sentence is required to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense.

Sincerely,

PREET BHARARA  
United States Attorney

By: \_\_\_/s/ \_\_\_\_\_  
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Southern District of New York  
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cc: Thomas H. Nooter, Esq.